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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

**IN RE: LITHIUM ION BATTERIES
ANTITRUST LITIGATION**

Case No. 13-MD-02420 YGR (DMR)

MDL NO. 2420

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

**INDIRECT PURCHASER PLAINTIFFS'
NOTICE OF INTENTION TO SEAL
DOCUMENTS**

Date: January 12, 2018

Time: 10:00 a.m.

Judge: Hon. Yvonne Gonzalez Rogers

Court: Courtroom 1, 4th Floor

INDIRECT PURCHASER PLAINTIFFS' NOTICE OF INTENTION TO SEAL DOCUMENTS;
Case No. 13-md-02420-YGR (DMR)

1 **TO THE COURT, THE CLERK, ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT**, pursuant to the Court's Order Granting Stipulation
3 Regarding Administrative Motions to Seal Materials Filed in Connection with Renewed Motion
4 for Class Certification and Related *Daubert* Motions ("Sealing Order") (ECF No. 1967), Indirect
5 Purchaser Plaintiffs intend to submit the following documents under seal:

- 6 1. Indirect Purchaser Plaintiffs' Reply to Tokin Corporation's Opposition to Indirect
7 Purchaser Plaintiffs' Renewed Motion for Class Certification;
- 8 2. Exhibits 1 through 4 to the Declaration of Steven N. Williams in Support of
9 Indirect Purchaser Plaintiffs' Reply to Tokin Corporation's Opposition to Indirect
10 Purchaser Plaintiffs' Renewed Motion for Class Certification.

11 The above documents refer to or contain information designated Confidential or Highly
12 Confidential under the applicable protective order entered in this action. ECF. No. 1967. The
13 permanent sealing of these documents will proceed according to the protocol described in the
14 Sealing Order. *Id.*

15 Dated: November 21, 2017

16 Respectfully Submitted,

17 COTCHETT, PITRE & MCCARTHY, LLP

18 By: /s/ Steven N. Williams
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